

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:22-CV-00068-BO

YOLANDA IRVING, et al.,

Plaintiffs,

v.

THE CITY OF RALEIGH, et al.,

Defendants.

AMENDED CROSS-NOTICE
OF DEPOSITION OF
EMANCIPATE NC, INC.,
PURSUANT TO F. R. CIV. P. 30(b)(6)
AND REQUEST FOR PRODUCTION
PURSUANT TO F. R. CIV. P. 30(B)(2)
AND 34

PLEASE TAKE NOTICE that pursuant to the provisions of Rules 30 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Omar I. Abdullah will take the deposition of **Plaintiff Emancipate NC, Inc.**, by and through its designated officer, director, managing agent, or other designee, on **Thursday, February 2, 2023, beginning at 10:00 a.m.**, at the law offices of Ellis & Winters, 4131 Parklake Avenue, Suite 400, Raleigh, NC 27612 or at such other time and location as may be agreed upon by the parties.

Pursuant to Rule 30(b)(6), Plaintiff Emancipate NC, Inc., shall designate one or more of its officers, directors, managing agents, or other persons to testify on its behalf concerning the following topic:

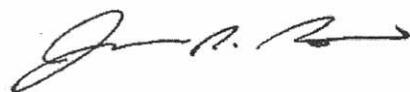
1. The September 23, 2021 community forum at Chavis Community Center organized and/or attended by Emancipate NC, Inc.

The deposition will be taken before a notary public or some other officer duly authorized by law to take depositions and will be recorded by stenographic and/or videotaped means. The deposition will continue from day to day until complete

Pursuant to Rules 30(b)(2) and 34 of the Federal Rules of Civil Procedure, Plaintiff Emancipate NC, Inc., is requested to produce for inspection and copying at the time of the deposition the documents described below which are in the possession, custody, or control of Plaintiff Emancipate NC, Inc., or which Plaintiff Emancipate NC, Inc. is aware:

1. All written materials prepared or disseminated by Emancipate NC, Inc. at the September 23, 2021 community forum at Chavis Community Center organized and/or attended by Emancipate NC, Inc.
2. Any recording, and any transcript thereof, of the September 23, 2021 community forum at Chavis Community Center organized and/or attended by Emancipate NC, Inc.

This the 9th day of January, 2023.



Jason R. Benton (N.C. State Bar No. 27710)
Daniel E. Peterson (N.C. State Bar No. 41251)
Jessica R. Dixon (N.C. State Bar No. 36719)
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Counsel for Defendant Omar Abdullah

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date, the foregoing *Amended Cross-Notice of Deposition of Emancipate NC, Inc., Pursuant to F. R. Civ. P. 30(B)(6) and Request for Production Pursuant to F. R. Civ. P. 30(B)(2) and 34* was served upon counsel of record via e-mail and First Class Mail as follows:

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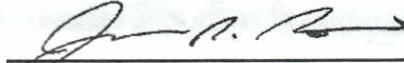
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Counsel for SEU Officer Defendants

This the 9th day of January, 2023.



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Daniel E. Peterson (N.C. State Bar No. 41251)
Jessica R. Dixon (N.C. State Bar No. 36719)
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Counsel for Defendant Omar I. Abdullah